

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Ralph L. Major : Case No. 21-11963-ELF
:
:
Debtor : Chapter 13

**DEBTOR'S ANSWER IN OPPOSITION TO THE MOTION FOR RELIEF FROM
STAY FILED BY AJAX MORTGAGE LOAN TRUST**

The Debtor herein, Ralph L. Major, by and through his counsel, hereby answers the Motion for Relief from the Automatic Stay filed by Ajax Mortgage Loan Trust, as follows:

1. Admitted.
2. Admitted in part; Denied in part. It is admitted only that Debtor executed a note. It is Denied that the Debtor executed a note with Ajax Mortgage Loan Trust.
3. Admitted in part; denied in part. It is admitted that the Debtor executed a mortgage. Proof of proper recording is required.
4. Admitted only that Debtor entered a loan modification and has made payments.
5. Denied. There are liens that have been addressed in the Chapter 13 Plan.
6. Denied. The Debtor has attempted to make payments and is seeking to resolve all payment issues.
7. Denied. There is no justification or support for this request. The Debtor filed the bankruptcy because he is seeking to keep his home.
8. Denied. The Debtor has attempted to make payments. In addition, the Debtor has equity in his residence providing adequate protection to Movant. Further, there is no reason for Movant to have incurred any fees or costs in this case.

9. Denied. There is no justification or support for this request. Strict proof is demanded.
10. Denied. There is no justification or support for this request. Strict proof is demanded.

WHEREFORE, the Debtor respectfully requests that the Court deny the relief requested in the Motion, and for such other and further relief as is just.

Respectfully submitted,

Signed: /s/Eugene A. Camposano
Eugene A. Camposano, Esquire
Attorney for Debtor

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CERTIFICATION OF SERVICE

I, Eugene A. Camposano, hereby certify that the foregoing Debtor's Answer in
Opposition to the Motion for Relief of Ajax Mortgage Loan Trust,
was served by electronic means, on November 8, 2022 on the following:

Adam B. Hall, Esquire
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216

Respectfully submitted,

Signed: /s/Eugene A. Camposano
Eugene A. Camposano, Esquire
Attorney for Debtor

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